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LOOMIS, FARGO & CO., HARRY DENNIS
and RICHARD HUDSON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JUAN MIGUEL AGUAS)	Case No.: 2:05-CV-00241-GEB-PAN
)	
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER
)	EXTENDING DISCOVERY DEADLINE
)	FOR WITNESS DEPOSITIONS
LOOMIS, FARGO & CO., a Texas)	
corporation; HARRY DENNIS; RICHARD)	
HUDSON; and DOES I through XX,)	
inclusive,)	
Defendants.)	
)	

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1 Plaintiff Juan Miguel Aguas ("Plaintiff") is represented by Johnny L. Griffin, III and
2 Victoria M. Ciganda of the Law Offices of Johnny L. Griffin, III. Defendants Loomis, Fargo &
3 Co., Harry Dennis, and Richard Hudson ("Defendants") are represented by Richard R. Gray
4 and Katy A. Bolls of Littler Mendelson.

5 The discovery cut-off date set forth in the Status (Pretrial Scheduling) Order is
6 November 30, 2005. There are approximately ten witness depositions that remain to be
7 completed. The parties agree that the discovery cut-off should be extended for the purpose of
8 taking the witness depositions and therefore jointly request that the Court enter an Order
9 extending the discovery cut-off.
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11 The parties agree that good cause exists to extend the discovery cut-off for the purpose
12 of witness depositions. The parties are engaged in serious settlement negotiations and wish to
13 avoid the expense of witness depositions at this time. Moreover, due to scheduling conflicts the
14 parties are unable to complete the witness depositions before the discovery cut-off date set by
15 the Court.

16 The parties further agree that extending the discovery cut-off for the purpose of witness
17 depositions will not modify or change any other date set forth in the Status (Pretrial
18 Scheduling) Order.

19 **IT IS HEREBY STIPULATED** by and between the parties hereto through their
20 respective attorneys of record that the discovery cut-off set forth in the Status (Pretrial
21 Scheduling) Order on November 30, 2005, shall be extended until February 3, 2006, for the
22 sole purpose of witness depositions. The parties jointly request that the Court enter an Order
23 accordingly.
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25

1 Dated: October 26, 2005

LAW OFFICES OF JOHNNY L. GRIFFIN, III

2
3 By: /s/ Victoria M. Ciganda
4 VICTORIA M. CIGANDA
Attorney for JUAN MIGUEL AGUAS

5
6 Dated: October 26, 2005

LITTLER MENDELSON

7
8 By: /s/ Richard R. Gray
9 (as authorized on October 26, 2005)
RICHARD R. GRAY
10 Attorney for LOOMIS, FARGO & CO.,
11 HARRY DENNIS and RICHARD
HUDSON

12 Since the parties stipulated to the requested continuance, the good cause issue is not
13 reached and the request is granted. The discovery completion date is continued to February 3,
14 2006.

15 **IT IS SO ORDERED.**

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17 DATED: October 27, 2005

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
18 United States District Judge
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